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FILED

JUL 20 2011

RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

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9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
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12 UNITED STATES OF AMERICA,)

CASE NO. Cr. 09-0862 MHP

13 Plaintiff,)

14 v.)

**STIPULATION AND
(PROPOSED) ORDER
TO MODIFY CONDITIONS OF
PRETRIAL RELEASE**

15 SERGEI V. SHKURKIN,)

16 Defendant.)
17 _____)
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20 Defendant, Sergei V. Shkurkin, through his counsel, and the United States, through its
21 counsel, hereby stipulate and request that the conditions of pretrial release for Sergei Shkurkin be
22 modified, as follows:

23 1. Mr. Shkurkin's travel restrictions, which presently allow him to travel within the
24 Eastern and Northern Districts of California without notice to Pre-Trial Services, shall be
25 amended to allow Mr. Shkurkin to travel to Reno, Nevada on July 27 and 28, 2011. The purpose
26 of this is to allow Mr. Shkurkin to participate in work-related activities at the University of
27 Nevada, Reno.
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Eastern District of California Pre-Trial Services Officer Beth Baker reports that Mr. Shkurkin continues to be in full compliance with his obligations and she has no objection to this proposed stipulation and order. Northern District Pre-Trial Services Officer Rich Sarlatte's office has also been notified of this proposed order as well.

All other terms and conditions of Pre-Trial release remain in effect.

IT IS SO STIPULATED.

DATED: July 13, 2011

/s/ Andrew Caputo
ANDREW CAPUTO
Assistant United States Attorney

DATED: July 13, 2011

/s/ William J. Portanova
WILLIAM J. PORTANOVA
Attorney for Defendant Sergei V. Shkurkin

IT IS SO ORDERED.

DATED: 7/20/11


THE HON. TIMOTHY J. BOMMER
United States Magistrate Judge